

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)
) Chapter 11
)
FIRST GUARANTY MORTGAGE)
CORPORATION, *et al.*,¹) Case No. 22-10584 (CTG)
)
) (Jointly Administered)
Debtors.)
)
) **Re. Docket No. 1000**

LIQUIDATING TRUSTEE'S WITNESS AND EXHIBIT LIST
FOR HEARING ON DECEMBER 21, 2023 AT 10:00 A.M. (ET)

The Liquidating Trustee hereby submits this witness and exhibit list in connection with the *Liquidating Trustee’s Fourth Omnibus Objection to Misclassified Claims (Substantive)* [Docket No. 1000] (the “Objection”) as it relates to the claims filed by Bella Place Trust, scheduled for hearing on **December 21, 2023 at 10:00 a.m. (ET)**, before the Honorable Craig T. Goldblatt, at the United States Bankruptcy Court for the District of Delaware, located at 824 N. Market Street, Wilmington, Delaware 19801 (the “Hearing”).

WITNESSES

The Liquidating Trustee designates the following persons as witnesses in connection with the Objection:

- (1) Aaron Samples, formerly of First Guaranty Mortgage Corporation.

The Liquidating Trustee also cross designates all witnesses designated by any other party in connection with the Objection, and reserve the right to call any necessary rebuttal or impeachment witnesses.

1 The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 13901 Midway Road, Suite 102-334, Dallas, TX 75244.

EXHIBITS

The Liquidating Trustee designates the following exhibits that may be used in connection with the Objection:

Exhibit No.	Document Description	Docket No.
1	Declaration Of Aaron Samples In Support Of Liquidating Trustee's Reply In Support Of Objection To Bella Place Trust's Claim	1071 – Exhibit A
2	Response to Objection	1071 – Exhibit B
3	Dismissal Order	1071 – Exhibit C
4	Dismissal Order	1071 – Exhibit D
5.	Docket Entry	1071 – Exhibit E
6.	Docket Entry	1071 – Exhibit F
7.	Stipulation of Voluntary Dismissal	1071 – Exhibit G
8.	Notice of Dismissal	1071 – Exhibit H

The Liquidating Trustee also cross designate all exhibits designated by any other party in connection with the Objection, and reserve the right to use additional exhibits for rebuttal or impeachment purposes.

The Liquidating Trustee reserves the right to amend or supplement this witness and exhibit list prior to the Hearing.

Dated: December 19, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
Timothy P. Cairns (DE Bar No. 4228)
Mary F. Caloway (DE Bar No. 3059)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
tcairns@pszjlaw.com
mcaloway@pszjlaw.com

-and -

DENTONS US LLP

Samuel R. Maizel
Tania M. Moyron
601 S. Figueroa Street, #2500
Los Angeles, CA 90017
Telephone: (213) 623-9300
Email: samuel.maizel@dentons.com
tania.moyron@dentons.com

-and-

DENTONS US LLP

David F. Cook
1900 K Street, NW
Washington, DC 20006
Telephone: (202) 496-7500
Email: david.f.cook@dentons.com

Counsel for the Liquidating Trustee